

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

IN RE: JOHNSON & JOHNSON TALCUM
POWER PRODUCTS MARKETING, SALES
PRACTICES, AND PRODUCTS LIABILITY
LITIGATION

No. 3:16-md-02738-MAS-RLS

**DECLARATION OF JESSICA DAVIDSON IN SUPPORT OF
DEFENDANTS JOHNSON & JOHNSON AND LLT MANAGEMENT,
LLC’S MEMORANDUM OF LAW IN SUPPORT OF MOTION TO
EXCLUDE THE OPINIONS OF DR. JOHN GODLESKI**

I, Jessica Davidson, declare as follows:

I am an attorney and a partner with the law firm Skadden, Arps, Slate, Meagher & Flom LLP, counsel for Defendants Johnson & Johnson and LLT Management, LLC (hereafter, “Defendants”) in the above-captioned matter. The facts stated in this Declaration are true of my own personal knowledge. I submit this Declaration in Support of Defendants’ Memorandum of Law in Support of Motion to Exclude the Opinions of Dr. John Godleski, in the above case.

1. Attached hereto as **Exhibit 1** is a true and correct copy of the transcript of the deposition of John Godleski, March 28, 2024, in the above case.
2. Attached hereto as **Exhibit 2** is a true and correct copy of the CV of John Godleski.

3. Attached hereto as **Exhibit 3** is a true and correct copy of the transcript of the deposition of John Godleski, April 19, 2024, in the above case.
4. Attached hereto as **Exhibit 4** is a true and correct copy of the transcript of the deposition of John Godleski in *Blaes v. Johnson & Johnson*, No. 4:14-cv-00213-RLW (E.D. Mo. May 27, 2015).
5. Attached hereto as **Exhibit 5** is a true and correct copy of the Report of John Godleski Re: Anna Gallardo, July 21, 2021, in the above case.
6. Attached hereto as **Exhibit 6** is a true and correct copy of the Report of John Godleski Re: Hilary Converse, July 12, 2021, in the above case.
7. Attached hereto as **Exhibit 7** is a true and correct copy of the Report of John Godleski Re: Tamara Newsome, June 24, 2021, in the above case.
8. Attached hereto as **Exhibit 8** is a true and correct copy of the Report of John Godleski Re: Pasqualina Rausa, June 21, 2021, in the above case.
9. Attached hereto as **Exhibit 9** is a true and correct copy of the Report of John Godleski Re: Carter Judkins, June 18, 2021, in the above case.
10. Attached hereto as **Exhibit 10** is a true and correct copy of the transcript of the deposition of John Godleski, March 29, 2024, in the above case.
11. Attached hereto as **Exhibit 11** is a true and correct copy of Cramer, *Presence of Talc in Pelvic Lymph Nodes of a Woman with Ovarian Cancer and Long-Term Genital Exposure to Cosmetic Talc*, 110(2) Obstet. Gynecol. 498 (2007).

12. Attached hereto as **Exhibit 12** is a true and correct copy of McDonald, *Migration of Talc From the Perineum to Multiple Pelvic Organ Sites: Five Case Studies With Correlative Light and Scanning Electron Microscopy*, 152 Am. J. Clin. Pathol. 590 (2019).

13. Attached hereto as **Exhibit 13** is a true and correct copy of Heller, *The Relationship Between Perineal Cosmetic Talc Usage and Ovarian Talc Particle Burden*, 174(5) Obstet. Gynecol. 1507 (1996).

I certify under penalty of perjury that the foregoing is true and correct.

Dated: July 23, 2024



Jessica Davidson